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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
APR 21 2005
at 10 o'clock and 40 min. AM
WALTER A. Y. H. CHINN, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT CRUZ AGUIGUI,

Defendant.

CR. NO. **CR05-00165 HG**
INFORMATION
[18 U.S.C. 201(b)(2)(B)]

INFORMATION

COUNT 1

The United States Attorney charges that:

On or about December 20, 2002, through and including March 14, 2003, within the District of Hawaii, Robert Cruz Aguigui, a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept money personally from an undercover agent, in return for being

influenced to commit, and aid in committing, and to collude in, and allow, any fraud, and make the opportunity for the commission of any fraud, on the United States, to wit: the unauthorized sale of recyclable material from United States Navy Recycling Program.

In violation of Title 18, United States Code, Section 201(b) (2) (B) .

COUNT 2

The United States Attorney further charges that:

On or about June 21, 2002 through and including December 2, 2002, within the District of Hawaii, Robert Cruz Aguigui, a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept money from I.Y.C., in return for being influenced to commit, and aid in committing, and to collude in, and allow, any fraud, and make the opportunity for the commission of any fraud, on the United States, to wit: the unauthorized sale of recyclable materials from the United States Navy Recycling Program.

In violation of Title 18, United States Code, Section 201(b) (2) (B) .

COUNT 3

The United States Attorney further charges that:

On or about July 10, 2000, through and including October 10, 2003, within the District of Hawaii, Robert Cruz

Aguigui, a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept money personally from W.L., in return for being influenced to commit, and aid in committing, and to collude in, and allow, any fraud, and make the opportunity for the commission of any fraud, on the United States, to wit: the unauthorized sale of recyclable materials from the United States Navy Recycling Program.

In violation of Title 18, United States Code, Section 201(b) (2) (B).

COUNT 4

The United States further charges that:

On or about March 26, 2003, within the District of Hawaii, Robert Cruz Aguigui, a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept money personally from an undercover agent, in return for being influenced to commit, and aid in committing, and to collude in, and allow, any fraud, and make the opportunity for the commission of any fraud, on the United States, to wit: the procurement of a Navy Recycling Program contract, bypassing the competitive bid process and understating the amount of scrap metal agreed to be provided.


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In violation of Title 18, United States Code, Section
201(b) (2) (B) .

DATED: APR 21 2005, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By 
LARRY L. BUTRICK
Assistant U.S. Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

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